

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b>	:	
<b>RICARDO A. READ-BAEZ</b>	:	<b>CASE NO. 1-18-02041-HWV</b>
<b>Debtor</b>	:	
	:	<b>CHAPTER 13</b>
<b>NISSAN MOTOR ACCEPTANCE</b>	:	
<b>CORPORATION</b>	:	
<b>Movant</b>	:	
	:	
<b>v.</b>	:	
	:	
<b>RICARDO A. READ-BAEZ</b>	:	
<b>Respondent</b>	:	

**DEBTOR'S RESPONSE TO MOTION OF  
NISSAN MOTOR ACCEPTANCE CORPORATION  
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, comes Debtor, Ricardo A. Read-Baez, by and through his attorney, Gary J.

Imblum, and respectfully responds as follows:

1. Admitted.
2. Admitted.
3. Admitted in part and denied in part. Debtor has no knowledge as to the holder of the lease Agreement. Strict proof is demanded.
4. Admitted in part and denied in part. The Certificate of Title speaks for itself. Strict proof is demanded.
5. Admitted in part and denied in part. Debtor has no knowledge. Strict proof is demanded.
6. Admitted in part and denied in part. Debtor has no knowledge. Strict proof is demanded.
7. Admitted in part and denied in part. The Agreement speaks for itself. Strict proof

is demanded.

8. Denied. Movant is protected since there is an abundance of equity in the vehicle.

Debtor offers to pay \$500.00 immediately. Debtor will make an offer in the near future to cure the remaining arrearage.

9. Denied. There is no reason why Rule 4001(a)(3) should not apply.

**WHEREFORE**, Debtor respectfully requests that this Honorable Court issue an Order denying the Motion for Relief From Stay.

Respectfully submitted,

  
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Gary J. Imblum  
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4615 Derry Street  
Harrisburg, PA 17111  
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gary.imblum@imblumlaw.com  
Attorney for Debtor

DATED: 06 / 08 / 2020

**CERTIFICATION OF SERVICE**

I, Carol V. Shay, Paralegal, do hereby certify that I have served a copy of the foregoing  
DEBTOR'S RESPONSE TO MOTION OF NISSAN MOTOR ACCEPTANCE CORPORATION  
FOR RELIEF FROM THE AUTOMATIC STAY upon the following persons by E-Service or by  
United States Mail, first class, postage prepaid, at Harrisburg, Dauphin County, Pennsylvania,  
addressed to:

CHARLES J DEHART III ESQUIRE  
CHAPTER 13 TRUSTEE  
VIA E-SERVICE

dehartstaff@pamd13trustee.com

JAMES C. WARBRODT, ESQUIRE  
KML LAW GROUP, P.C.  
COUNSEL FOR MOVANT  
VIA E-SERVICE

IMBLUM LAW OFFICE, P.C.

/s/ Carol V. Shay

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For Debtor

DATED: 06 / 08 / 2020